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Filing date: **09/18/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206906
Party	Defendant Concord Chemical
Correspondence Address	MATTHEW H. SWYERS, ESQ. THE TRADEMARK COMPANY 344 MAPLE AVE W STE 151 VIENNA, VA 22180-5612 admin@thetrademarkcompany.com
Submission	Answer
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	09/18/2012
Attachments	Answer.pdf (4 pages)(22438 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Serial No. 85/439,486

For the mark: MAXI-FRIG,

Maxifrig Refrigerant Supply Co., Inc.,

Opposer,

vs.

Concord Chemical,

Applicant.

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Opposition No. 91206906

ANSWER AND GROUNDS OF DEFENSE

COMES NOW the Applicant, Concord Chemical (hereinafter “Applicant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

Applicant is without knowledge of the allegations set forth in the Introductory Paragraph of the Notice of Opposition and therefore denies the same.

Applicant is without knowledge of the allegations set forth in the second Introductory Paragraph of the Notice of Opposition and therefore denies the same.

1. Applicant denies the allegations set forth in Paragraph 1 of the Notice of Opposition as phrased and demands strict proof thereof.

2. Applicant is without knowledge of the allegations set forth in Paragraph 2 of the Notice of Opposition and therefore denies the same.

3. Applicant is without knowledge of the allegations set forth in Paragraph 3 of the Notice of Opposition and therefore denies the same.

4. Applicant denies the allegations set forth in Paragraph 4 of the Notice of Opposition and demands strict proof thereof.

5. Applicant denies the allegations set forth in Paragraph 5 of the Notice of Opposition and demands strict proof thereof.

6. Applicant denies the allegations set forth in Paragraph 6 of the Notice of Opposition and demands strict proof thereof.

7. Applicant is without knowledge of the allegations set forth in Paragraph 7 of the Notice of Opposition and therefore denies the same.

8. Applicant is without knowledge of the allegations set forth in Paragraph 8 of the Notice of Opposition and therefore denies the same.

9. Applicant denies the allegations set forth in Paragraph 9 of the Notice of Opposition and demands strict proof thereof.

10. Applicant denies the allegations set forth in Paragraph 10 of the Notice of Opposition and demands strict proof thereof.

11. Applicant denies the allegations set forth in Paragraph 11 of the Notice of Opposition and demands strict proof thereof.

12. Applicant denies the allegations set forth in Paragraph 12 of the Notice of Opposition and demands strict proof thereof.

13. Applicant denies the allegations set forth in Paragraph 13 of the Notice of Opposition and demands strict proof thereof.

Applicant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 18th day of September, 2012.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Applicant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 18th day of September, 2012, to
be served, via first class mail, postage prepaid, upon:

Dennis D. Prahl, Esq.
1040 Avenue of Americas
New York, NY 10018

/Matthew H. Swyers/
Matthew H. Swyers